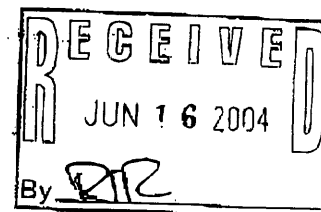




E1-877

**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
Southeast Regional Office  
9721 Executive Center Drive North  
St. Petersburg, Florida 33702-2432

June 14, 2004



Mr. Winn Frank  
Parsons Transportation Group  
1133 15<sup>th</sup> Street NW  
Washington, DC 20005

Re: STB Finance Docket No. 34421, Holrail LLC-Construction and Operation  
of New Railroad Line, Orangeburg and Dorchester Counties, South Carolina

Dear Mr. Winn:

The National Marine Fisheries Service (NOAA Fisheries) has reviewed preliminary plans for the referenced project provided with your May 5, 2004, letter. The proposed project consists of constructing a two-mile-long section of new railroad between the Town of Holly Hill and the Giant Cement Company facility. The purpose of the proposed rail construction is to provide an alternative to the existing railroad access provided by CSX Corporation.

Based on review of aerial photography and familiarity with the general area, the new rail alignment would affect freshwater forested wetlands and deepwater habitats of Four Hole Swamp, a major tributary of the Edisto River. Freshwater wetlands provide a number of vital ecological and water resource functions including habitat for aquatic species, floodwater storage, aquifer recharge, and water quality enhancement through removal and assimilation of stormwater-borne pollutants from upland areas. NOAA Fisheries public trust resources present in the Edisto River basin, and potentially affected by project induced habitat loss or degradation, include diadromous fishes such as American shad, blueback herring, American eel, striped bass, and the federally listed endangered shortnose sturgeon.

To provide adequate assessment of potential impacts of the project on fishery and aquatic resources, the following considerations should be thoroughly addressed:

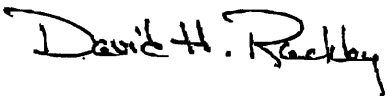
1. The purpose and need for the project should be identified.
2. The environmental analysis should describe all practicable alternatives.
3. Potential effects of the project on wetlands and deepwater habitats should be thoroughly assessed, including identification of cumulative impacts of other reasonably related project improvements at the Holcim US facility.



4. A wetland protection plan demonstrating avoidance, minimization, and compensatory mitigation for any unavoidable losses of wetlands should be presented in the environmental documentation for the project.
4. Potential effects of the project on federally protected species, including the shortnose sturgeon, should be fully assessed including review by local and regional species experts.

Thank you for an opportunity to participate in early planning on this project. Please direct related questions or comments to the attention of Mr. Prescott Brownell at our Charleston Field Office. He may be reached at 219 Fort Johnson Road, Charleston, South Carolina 29412-9110, or at (843) 762-8591.

Sincerely,

  
for Miles M. Croom  
Assistant Regional Administrator  
Habitat Conservation Division

cc:

Ed Duncan, SCDNR  
Quinton Epps, SCDHEC  
Tim Hall, FWS  
Tom Wellborn, EPA  
F/SER4  
F/SER3, S. Bolden